

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

* * * * *

DR. ROBERT LEDERER,
Plaintiff,

v.

JOHN SNOW, INC. and
THE JOHN HOPKINS UNIVERSITY/
CENTER FOR COMMUNICATION
PROGRAM,
Defendants.

* * * * *

MAGISTRATE JUDGE Dea

04 10284 NG

CIVIL ACTION NO.

RECEIPT # 53746
AMOUNT \$ 150
SUMMONS ISSUED _____
LOCAL RULE 4.1 _____
WAIVER FORM _____
MCF ISSUED _____
BY DPTY. CLK. 18
DATE 2-11-04

NOTICE OF REMOVAL OF THE DEFENDANT,
JOHNS HOPKINS UNIVERSITY/CENTER FOR COMMUNICATION PROGRAMS

Johns Hopkins University/Center for Communication Programs,
hereby notices the removal of the above-entitled action from the
Superior Court Department of the Trial Court of the Commonwealth
of Massachusetts for Suffolk County, to this Court. The grounds
for this Notice are as follows.

- (1) Petitioner is a defendant in the above-entitled
action.
- (2) On December 15, 2003, the above-entitled action was
commenced against the defendant in the Superior Court
Department of the Trial Court of the Commonwealth of
Massachusetts for Suffolk County, and is now pending
therein.

- (3) On or about January 29, 2004, defendant, Johns Hopkins University/Center for Communication Programs, received service of the Summons and Complaint in the above-entitled action, a copy of which is attached hereto and marked Exhibit "A".
- (4) No further proceedings have been had herein in the Superior Court for Suffolk County.
- (5) The plaintiff alleges that he is an individual with a residential address at 81 Palm Tree Drive, Punta Gorda, Florida.
- (6) The plaintiff further alleges that the defendant, John Snow, Inc., is a Massachusetts corporation with a principal place of business at 44 Farnsworth Street, Boston, Suffolk County, Massachusetts.
- (7) Defendant, Johns Hopkins University/Center for Communication Programs, is a Maryland corporation with a principal place of business at 113 Garland Hall, 3400 N. Charles Street, Baltimore, Maryland.
- (8) In the plaintiff's complaint, the plaintiff alleges that the plaintiff contracted with defendants to provide services for defendants' project in Romania. Plaintiff further alleges that defendants breached said contract by not allowing plaintiff to complete said project.
- (9) The amount in controversy in the above-entitled action exclusive of interest and costs, but inclusive of the statutory claim for attorneys' fees and multiple damages exceeds Seventy-Five Thousand Dollars (\$75,000.00).

(10) This Court has original jurisdiction of this action based on diversity of citizenship of the parties, 28 U.S.C. 1332, and the action may be removed to this Court pursuant to 28 U.S.C. 1441(a) and (b).

(11) This petition is filed with this Court pursuant to 28 U.S.C. § 1446, within 30 days after receipt by petitioner of the summons and complaint in the above-entitled action.

WHEREFORE, petitioner, Johns Hopkins University/Center for Communication Programs, prays that the above-entitled action be removed from the Superior Court Department of the Trial Court of the Commonwealth of Massachusetts for Suffolk County, to this Court.

Signed under the penalties of perjury this 10th day of February, 2004.

Johns Hopkins University/
Center for Communication Programs,

By its attorneys,

John F. Rooney III

John F. Rooney, III,
BBO #426895
MELICK, PORTER & SHEA, LLP
28 State Street
Boston, MA 02109-1775
(617) 523-6200

Date: 2-11-04

I hereby certify that I have made service
of the foregoing document in accordance
with the provisions of Fed R Civ P 5